

**Alternate Approach To Force on
Force Inspections**

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Background

- NRC FOF inspections since 1991
- Conducted once approximately every 8 years
- Briefly suspended prior to 2001
- Redesigned and fully implemented by late 2004
- NRC evaluated exercises every three years
- Currently in Cycle IV

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- Efforts to implement an alternate approach to FOF go back several years
- SREP (Security Response Evaluation Program)
- SPA (Security Performance Assessment)
- Contributions by senior industry and NEI leadership, as well as NRC Staff and Commissioners

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Background

- NRC revised the FOFSDP in 2012 to begin giving consideration to “program threshold criteria” when determining significance of FOF findings
- Program Threshold issues include performance in Licensee administered FOF Drills and Exercises and baseline inspection issues

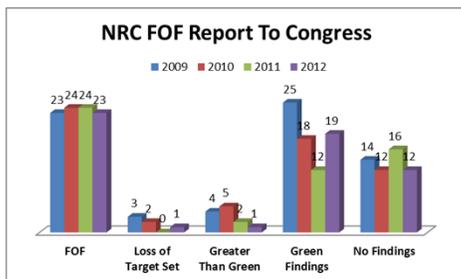
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Background

- The industry continues to improve in demonstrating the effectiveness of our protective strategies in NRC Evaluated FOF Exercises
- Results have improved of the first three FOF cycles
- FOF Drill failures and FOF findings are reduced while drills remain challenging and complex

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Force On Force



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Industry Actions

- NEI formed an Alternate Approach to FOF Focus Group (AFOF) at the end of February 2013
- The FOF task force continues to work with NRC staff to address FOF issues
- NEI and Industry executives continue to dialogue with senior NRC staff
- First Focus Group meeting with NRC staff in second quarter 2013

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Industry/NRC Actions

- During the 2nd quarter meeting, industry discussed transition to a new process with some inspection elements similar to the EP inspection process
- In order to gather data, NRC developed IP 71130.09 and NEI agreed to conduct pilot inspections of licensee annual exercises, one in each region
 - Key milestone to pursue alternate approach

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Industry/NRC Actions

- The pilot NRC inspections of annual exercises were conducted throughout the summer of 2013
 - Sites performed exceptionally well
- In September 2013 the AFOF Task Force developed a white paper identifying significant areas for improvement in the FOF process and vetted it with industry executives for discussion

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Industry/NRC Actions

- The AFOF Focus Group met with NRC staff on 4th quarter to discuss a more defined approach to improve the FOF inspection process
 - The approach revises the number of exercises and evaluation of results that includes additional considerations of other program elements and a path forward

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Industry/NRC Actions

- Focus of the meeting was to receive an overview from NRC on the staff's plan for a phased approach to revise the physical protection baseline inspection program and FOF evaluations beginning in CY 2014

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Industry/NRC Actions

- NRC revised the security baseline inspection program to incorporate annual NRC-observed licensee-evaluated exercises
- Inclusion of annual exercises in the inspection effort will inform the FOF testing program and provide the industry credit for performing, evaluating and critiquing its protective strategy through the implementation of the Performance Evaluation Program

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Industry/NRC Actions

- Since the meeting, a new draft FOF SDP was developed by the NRC
- Revisions to IP 71130.03 (Contingency Response and Force-on-Force Testing) and 71130.05 (Protective Strategy Evaluation and Performance Evaluation Program) were made effective 1/1/14 to incorporate program changes and 71130.09 (Pilot IP) was eliminated
- AFOF task force developed an initial guidance white paper for the new proposed critique process

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New Inspection Process

- Phase 1
 - Annual exercise observations have been incorporated into the protective strategy inspection (IP 71130.05)
 - Two evaluated exercises for triennial (IP 71130.03)
 - Incorporate a new FOF management critique (similar to EP) for day 3 of EFOF week; which involves entire inspection process
 - Implemented on January 1st, 2014

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New Inspection Process (cont.)

- The inspection of annual exercises that was piloted in 2013 is now incorporated into IP 71130.05 (protective strategy)
 - NRC regional inspectors will work with sites to establish an inspection date for observation of an annual exercise
 - The inspection may or may not take place during the same week as the rest of the .05 inspection
 - NRC regional inspectors will watch one annual exercise over the triennial cycle

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New Inspection Process

- Triennial EFOF currently consist of:
 - Planning week – no substantial change
 - Scenario development – no substantial change
 - Exercise week consist of two planned exercises
 - Critiques, “hot wash” will be conducted after each exercise
 - Good quality input is needed to gather data for a new third day FOF management summary critique process

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FOF Critique Process

- This new final FOF management summary critique should be conducted on day three of the inspection
- Key personnel need to be involved in the critique (e.g., lead controller, lead adversary controller, security management, site senior management)
- A summary presentation is provided to site senior management personnel and the NRC team
- This includes appropriate items entered into the site Corrective Action Process (CAP)

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Future Inspection Process

- Phase 2
 - Develop standard Security Performance Indicators to improve upon Program Threshold Criteria (PTC)
 - The PTC is used to provide better criteria for crediting or deducting credit other security program areas based on performance

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Future Inspection Process

- After the new performance indicators (PI) are developed and tested, the goal is to reduce the triennial EFOF to a single NRC Evaluated Exercise combined with the other program elements
 - The proposed timeline is the beginning of the next ROP cycle and FOF cycle January 1, 2017

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FOF Critique Process

- The purpose is to provide objective criteria for assessing activities throughout the inspection period and the effectiveness of implementation of the site's protective strategy during exercises
- A NEI white paper has been developed by the AFOF Focus Group for industry use to provide a consistent critique format that meets inspection criteria

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FOF Critique Process

- The white paper format includes:
 - Criteria for exercise planning and development
 1. Site introduction and badging
 2. Protective strategy briefing
 3. Site tour (OCA/PA/VA)
 4. Insider information
 5. Tabletop drills
 6. Scenario matrix development
 7. IDS testing
 8. CAF Performance

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FOF Critique Process

– Five “Key” exercise program elements to be evaluated with supporting criteria for each key element

1. Sufficient number of personnel
2. Timely response
3. Protective/defensive positions
4. Appropriate armament
5. Target set protection

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FOF Critique Process

– Eleven Exercise Objectives that support the Key Elements

1. Safety
2. Detect, Assess, Communicate, Respond
3. Alarm Station Response
4. Team Tactics
5. Command and Control
6. Effective Emergency Communications/Notifications
8. Armed Responder tactics
9. Effective use of weapons and equipment
10. Controller preparation and performance
11. Conducting critiques and use of CAP

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FOF Critique Process

- Demonstration/evaluation criteria for each of the eleven exercise objectives
 - Provides details necessary to evaluate each objective
- Exercise week schedule
 - Provides an overview of activities during exercise week
- Management critique presentation rollup
 - Simple format for identifying and critiquing performance during the inspection
- Planning and exercise development checklist
 - Objectives and criteria for evaluating performance during planning week and scenario development week

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FOF Critique Process

- Controller evaluation sheets for each position that critiques player and controller performance for each of the objectives appropriate for that position
- Information from the “hot wash” critiques and the controller sheets will be compiled and incorporated into the formal management critique

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FOF Critique Process

- All identified issues will be entered into the Corrective Action Program
- Key personnel will conduct the critique with appropriate senior management and provide opportunity for their input
- NRC observes and verifies issues have been appropriately captured

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FOF Critique Process

- NRC will conduct a preliminary exit after the management critique
- All CAP products developed will be provided to the NRC
- Any additional CAP products developed after the NRC preliminary exit will be sent to them
- The formal NRC exit will normally take place at a later date

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